

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-534-MN-CJB
)	
LANCIUM LLC, MICHAEL T.)	
MCNAMARA, and RAYMOND E. CLINE,)	
JR.)	
)	
Defendants.)	

**DECLARATION OF ADAM KAUFMANN IN SUPPORT OF LETTER TO THE
HONORABLE CHRISTOPHER J. BURKE IN REPLY TO MOTION TO STRIKE THE
TRADE SECRET MISAPPROPRIATION COUNTS IN THE SECOND AMENDED
COMPLAINT**

I, Adam Kaufmann, hereby declare and state as follows:

1. I have personal knowledge of the facts set forth in this Declaration; I am competent to testify as to all matters stated in this Declaration; and, I am not under any legal disability that would preclude me from testifying. If called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am a partner at the law firm Barnes & Thornburg LLP, counsel of record for Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively, “Defendants”) in the above-captioned case. I am licensed in the State of Illinois and admitted *pro hac vice* to practice before this Court. I submit this declaration in support of Defendants’ Letter to the Honorable Christopher J. Burke in Reply to Motion to Strike the Trade Secret Misappropriation Counts in the Second Amended Complaint.

3. On October 8, 2021 counsel for Defendants produced documents bearings Bates numbers LANCIUM00014474 – LANCIUM00016739 to counsel for Plaintiffs in the above-

captioned case via email. This document production included the August 14, 2020 Complaint for Patent Infringement from *Lancium LLC v. Layer1 Technologies, Inc.*, Case No. 6:20-cv-00739-ADA filed in the United States District Court for the Western District of Texas, Waco Division.

4. Defendants' October 8, 2021 document production consisted of 239 documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of March, 2022 at Chicago, Illinois.



Adam Kaufmann